



RE: FCC Federal Communications Commission
Proceeding: 12-354

Dear Commissioners

Our company, Rapid Systems of Tampa Florida, is providing a very valuable service to communities throughout 11 counties in our state of Florida. Many of these counties are rural and do not have access to Broadband services that urban communities have. We supply broadband services to Local Government, Small Local Business' and residential users.

We have millions of dollars invested in 3.65, WIMAX and Cambium product to support Rural Florida Customers so the CBRS band is extremely important.

The ability to access up to 100 megahertz of mid-band spectrum is desperately needed to enable higher service tiers for our rural customers. Now not only does everyone in the home have three devices the home has multiple devices. Rural customer depend on broadband more than customers in major metro cities because of the lack of broadcast channels, radio and Cable TV. Content over IP for them is crucial for rural America as well as the education of our children.

The additional spectrum is needed for larger service packages, reaching customers further out and providing a better broadband experience. Wireless Service providers can utilize this spectrum now and equipment is available, this is not only good for customers but for the economy as we put people to work installing gear and bringing broadband to the needy.

T-Mobile and CTIA have filed requests with the FCC which, if adopted, could change CBRS dramatically.

T-Mobile has asked the FCC to essentially make CBRS PAL only, with only spectrum not purchased as PAL to be GAA. The likelihood is this will limit WISP access due to the cost and other factors. CTIA has asked the FCC to increase the terms for PAL's to as much as ten-years (with possible renewability) and to change the way in which the coverage regions for auctions are determined, effectively making them many times larger. These things may result in very expensive and possibly exclusive access to PAL and the possibility of little or no GAA availability. It will likely also push out the timeline for availability considerably.

If the FCC and Congress had intended just to auction the spectrum as another licensed band, they could have done so easily. They saw the need for a flexible innovative approach allowing much wider use and accessibility of the CBRS spectrum.

We support WISPA's position that CBRS should be maintained a multi-tier accessible and flexible resource.

Our business will provide excellent benefits to the community (residential and business) through the use of this resource without the modifications suggested by T-Mobile and CTIA.

WISPA fought very hard and successfully to urge the FCC to adopt favorable rules, and these two proposals would, if adopted, severely limit the benefits that were created for rural broadband deployment (among other use cases).

Rapid Systems **opposes** the CTIA and T-Mobile petitions.

Thank you for your time.

Denise Hamilton
Rapid Systems, CFO